

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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*Counsel to the Debtors
and Debtors-in-Possession*

In re:

NEW ENGLAND MOTOR FREIGHT, INC.,
et al.,

Debtors.

ALICE WATERS and RICH RICHARDSON,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

NEW ENGLAND MOTOR FREIGHT, INC., *et al.*,

Defendants.

Case No.: 19-12809 (JKS)

Chapter: 11

Hearing Date: November 12, 2019

Judge: John K. Sherwood

Adv. Proc. No. 19-01163(JKS)

APPLICATION FOR ORDER SHORTENING TIME

The applicant (Gibbons P.C., counsel to and on behalf of New England Motor Freight, Inc. and its affiliated debtors) (the “**Debtors**”) requests that the time period to/for the *Joint Motion by the Debtors and the Putative Class Representative Seeking Entry of Orders: (I) Preliminarily Approving a Settlement Agreement, (II) Certifying a WARN Class for Settlement Purposes Only, (III) Appointing Class Counsel and a Class Representative, (IV) Approving the Form and Manner of Notice to Class Members of the Class*

Certification and Settlement, (V) Scheduling a Fairness Hearing to Consider Final Approval of the Settlement Agreement, (VI) Approving the Settlement Agreement on a Final Basis After the Fairness Hearing, and (VII) Granting Related Relief (the “**Joint Motion**”) as required by Fed. R. Bankr. P. 2002 be shortened pursuant to FED. R. BANKR. P 9006(c)(1), for the reason(s) set forth below:

1. A shortened time hearing is requested because: [The Joint Motion seeks authorization for the joint movants to enter into the Settlement Agreement reached in the above-referenced putative class action. The Debtors respectfully request a shortened hearing date for preliminary approval of the settlement so as to allow time for Class Notice and for the Fairness Hearing to take place before the end of the year.]
2. State the hearing dates requested: [November 12, 2019 @ 10:00am.]
3. Reduction of the time period is not prohibited under FED. R. BANKR. P 9006(c)(1).

The applicant requests entry of the proposed order shortening time.

Date: [November 4, 2019]

[/s/ Mark B. Conlan]
Signature

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